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April 21, 2016

VIA Electronic Mail and CM-RRR

Regional Freedom of Information Officer
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue (6MD-OE)
Dallas, Texas 75202-2733
Fax (214) 665-2146
R6foia@epa.gov

RE: Request for Records – San Antonio Water System

Dear FOIA Liaison Officer:

In accordance with the provisions of the Freedom of Information Act, 5 U.S.C. § 552, Baker Wotring LLP hereby requests the prompt production and disclosure of any and all non-privileged documents, records, memoranda, lists, correspondence, and other information, whether draft, preliminary, interim or final, as well as any other related documentation on electronic format, identifying and/or referring to the San Antonio Water System from the time period starting October 15, 2013 to the present date, including but not limited to:

- San Antonio Water System Consent Decree, Civil Action No. 5:13-cv-00666-DAE, filed October 15, 2013;
- Sanitary Sewer Overflows from the San Antonio Water System;
- Enforcement action against the San Antonio Water System;
- Clean Water Act violations or alleged violations in connection with the San Antonio Water System.
- Penalties paid by the San Antonio Water System under any law regulating the environment or natural resources, including water.

In this request, the term “document” includes “records” as defined in 40 C.F.R. § 2.100(b) and is used to mean the following: all reports, lists, interagency memoranda, intra-agency memoranda, data correspondence, opinion letters, ledgers, studies, investigations, schedules, photographs, sound reproductions, ledger books, graphs, catalogues, statements or any other handwritten, typewritten, printed, recorded or graphic material of any kind or description whatsoever.

Please note that pursuant to 40 C.F.R. § 2.120(c), we are willing to pay the appropriate costs attributable to this request, and are also willing to make the necessary arrangements to remit fees as may be required by the U.S. EPA. We need no prior notice of the amount of the costs or fees unless they exceed \$500.00. If estimated copying and search fees exceed \$500.00, please contact the undersigned before proceeding.

We are requesting that the Agency respond within twenty (20) days of receipt of this request, as specified in 5 U.S.C. § 552(a)(6)(A). Please do not hesitate to contact the undersigned at (713) 980-1717 if you have any questions regarding this request.

Very truly yours,


Debra Tsuchiyama Baker